

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: JONATHAN BARGER

Debtor

Case No. 19-10254-JKF

(Chapter 13)

**NOTICE OF APPEAL AND STATEMENT OF ELECTION**

**PART 1: Identify the Appellant**

1. Name of Appellant: Jonathan Barger
2. Position of Appellant in the Bankruptcy Case that is subject of this appeal: Debtor.

**PART 2: Identify the Subject of this Appeal**

1. Describe the judgment, order, or decree appeal from: Order of the Honorable Jean K. FitzSimon, United States Bankruptcy Judge, granting Syndcore Holdings, LLC's Motion for Relief from the Automatic Stay. See attached as Exhibit "A" and made a part hereof.
2. State the date on which the judgment, order, or decree was entered: April 8, 2020.

**PART 3: Identify the Other Parties to the Appeal**

List the names of all parties to the judgment, order, or decree appeal from and the names, addresses and telephone numbers of their attorneys are as follows:

1. Party: Jonathan Barger  
Attorney: Alan B. Kane, Esquire  
The Law Office of Alan B. Kane  
600 Louis Drive, Suite 201  
Warminster, PA 18974  
Tele: (610) 279-5151
2. Party: Syndcore Holdings, LLC  
Attorney: Jason L. Rabinovich, Esquire  
Law Office of Jason Rabinovich, PLLC

1700 Market Street, Suite 1005  
Philadelphia, PA 19103  
Tele: (267) 423-4130

**PART 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**


If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 USC §158(c)(1), a party elects to have the appeal heard by the United District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District, check below. Do not check if the appellant wishes the Bankruptcy Court Appellant Panel to hear the appeal.

☒ Appellant elects to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

**PART 5: Sign Below**

Respectfully submitted,

Dated: April 21, 2020

By:   
Alan B. Kane, Esquire  
Attorney Id. No. 66379  
Attorney for Appellant,  
Jonathan Barger  
The Law Office of Alan B. Kane  
600 Louis Drive, Suite 201  
Warminster, PA 18974  
Tele No.: (610) 279-5151  
Fax No.: (267) 282-5687  
E-Mail: akaneesqcpa@msn.com

**EXHIBIT "A"**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CHAPTER 13**

**JONATHAN P. BARGER,**

**Bankruptcy No: 19-10254-jkf**

**Debtor.**

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**ORDER**

AND NOW, this 8th day of April 2020, upon consideration of Syndcore Holdings, LLC's Motion for Relief from the Automatic Stay (the "Motion"), any response or reply, and after sufficient notice and a hearing, it is hereby ORDERED that the Motion is GRANTED in its entirety. The stay is terminated and Syndcore Holdings, LLC may proceed with its state court action to foreclose on the property situated at 2505 Orthodox Street, Philadelphia, PA 19137.

BY THE COURT:

  
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